

Before the
FEDERAL COMMUNICATION COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
) CC Docket No. 95-116
Telephone Number Portability)

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**REPLY OF TELEPORT COMMUNICATIONS GROUP INC. TO RESPONSES TO
PETITIONS FOR RECONSIDERATION AND CLARIFICATION**

Teleport Communications Group Inc. ("TCG") hereby files this reply to the various responses to petitions for reconsideration and clarification of the First Report and Order ("Number Portability Order"), FCC 96-286, released July 2, 1996, in the above-captioned proceeding.

I. INTRODUCTION

On September 27, 1996, the Association of Local Telecommunications Services ("ALTS"), of which TCG is a member, filed a Response to the Petitions for Reconsideration and Clarification of the Commission's Number Portability Order ("ALTS response").¹ Though TCG agrees with the bulk of the ALTS response, TCG disagrees with ALTS on the single issue of whether two carriers should be permitted to agree to use Query on Release ("QoR") between their networks. TCG files these comments to clarify its position on QoR.

1. Response of the Association for Local Telecommunications Services to Petitions for Reconsideration and Clarification, In re Telephone Number Portability, CC Docket No. 95-116 (September 27, 1996).

By: James Reid 0210
By: ABCE

II. QoR CAN SAVE PRECIOUS FUNDS FOR SOME ENTRANTS DURING INITIAL IMPLEMENTATION OF NUMBER PORTABILITY

QoR is a database dip suppression functionality for the provision of number portability that relieves carriers from performing database dips on calls that are completed to the switch for which a dialed number was originally assigned. During initial implementation of number portability, few numbers will be ported from each NXX code.² Initially, most calls will be terminated to the original switch. However, once a *single* number has been ported from a particular NXX code, *all* calls terminating to a number with that NXX code must be dipped.

TCG expects that many, if not most, NXX codes in areas with permanent number portability will have at least one number ported soon after implementation. However, it may take significantly longer for a substantial amount of numbers to be ported from most NXX codes. This will have a substantial effect on implementation costs for incumbent local exchange carriers ("ILECs") as well as many competitive local exchange carriers ("CLECs"). Facilities-based CLECs will need to purchase additional service control point database pairs ("SCPs") as capacity on their original SCPs is exhausted. Capacity on the SCPs will be filled much more quickly if all calls to portable NXXs must be dipped. Additionally, CLECs that opt to perform database dips through a third party will be required to pay for a much larger number of dips.

2. An "NXX" refers to the first three digits in a seven-digit local telephone number. An NXX code contains a potential 10,000 local telephone numbers.

Since QoR can lower costs associated with the initial phase of permanent number portability, TCG would like to retain the option of using QoR. However, TCG maintains that the FCC should not require QoR of any carrier, as discussed further below. As more numbers are ported from existing NXX codes, fewer “unnecessary” dips will be performed. When the cost savings of prevented dips no longer outweigh the costs in using QoR, TCG feels that parties should then be free to terminate the use of QoR.

III. THE COMMISSION SHOULD ALLOW QoR AS LONG AS SUCH USE IS VOLUNTARY

TCG fully supports the ALTS position that CLECs should not be forced by an ILEC to use QoR. TCG acknowledges that QoR adds dialing delay to calls terminating to customers who have switched local service providers and have had their numbers ported in the process. Therefore, TCG believes that QoR should only be allowed at the discretion of the relevant CLEC after having an opportunity to weigh potential cost savings against the drawbacks of QoR. If two carriers agree mutually that QoR may be used between their respective networks, then TCG believes that QoR should be allowed.

IV. QoR SHOULD NOT BE ALLOWED TO DELAY IMPLEMENTATION OF LRN

ALTS asserts that once an ILEC has a sufficient number of agreements that allow voluntary QoR, then the ILECs could successfully seek a delay or even a cancellation of Location Routing Number (“LRN”) implementation based on the

apparent acceptance of the QoR process.³ TCG fully agrees that implementation of LRN should not be delayed, and sees no reason why QoR should cause such a delay.

QoR is a database dip suppression functionality that requires LRN. Therefore, QoR may be added after initial implementation of LRN. While TCG believes that QoR can produce valuable cost savings to carriers such as TCG, TCG does not see any reason to delay LRN. In its Number Portability Order, the Commission issued a strict implementation schedule for the introduction of number portability.⁴ TCG fully agrees with ALTS that QoR should not be used as an excuse to delay the introduction of number portability through the LRN method consistent with the FCC's schedule.

V. CONCLUSION

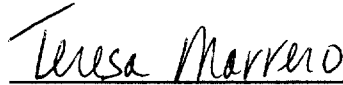
QoR can reduce implementation costs of permanent number portability for ILECs and CLECs alike. TCG endorses voluntary use of QoR. However, even voluntary

3. ALTS response at 2-3.

4. See Number Portability Order at Appendix F.

QoR should not delay in any manner the introduction of permanent number portability through the industry accepted LRN method.

Respectfully submitted,

A handwritten signature in cursive script, reading "Teresa Marrero", is positioned above a horizontal line.

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Dated: October 7, 1996

CERTIFICATE OF SERVICE

I, Josefina C. Barberena, do hereby certify that a copy of the foregoing Reply to Responses to Petitions for Reconsideration and Clarification was sent by first-class, postage pre-paid mail on this 7th day of October, 1996, to the following:

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